

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
AT MEMPHIS

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UNITED HEALTHCARE INSURANCE  
COMPANY,

Plaintiff,

V.

CASE NUMBER: 06-CV-02688-SHM-tmp

PATRICIA H. VEACH AND NAOMI  
KAY SESSUM,

Defendants.

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MOTION FOR DEFAULT JUDGMENT

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COMES NOW your Defendant, Naomi Kay Sessum, by and through her counsel, Timothy A. Perkins of the Beasley Law Firm, PLLC, in this Interpleader Action and moves the Court for an Order of Default Judgment in this matter. Ms. Sessum would show that Plaintiff United Healthcare Insurance Company filed its Complaint on October 10, 2006, and that Counsel for Defendant Patricia H. Veach accepted service on February 9, 2007. More than twenty (20) days have passed since service of process, and Defendant Veach has failed to file a Responsive Pleading in any form.

**WHEREFORE, AND FOR ALL OF WHICH,** Defendant Naomi Kay Sessum moves this Court for an Order of Default Judgment in her favor and an Order directing the Clerk of the Court to disburse the disputed insurance proceeds for her benefit.

Respectfully submitted,

S/ TIMOTHY A. PERKINS BPR #24657

**THE BEASLEY LAW FIRM**

Attorney for Plaintiff/Counter-Defendant  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was forwarded, via first class U. S. Mails, postage prepaid, to Attorney Barbara McCullough, counsel of record for the Defendant Patricia H. Veach, Barbara McCullough, 44 North Second Street Suite 401, Memphis, Tennessee 38103.

s/Timothy A. Perkins